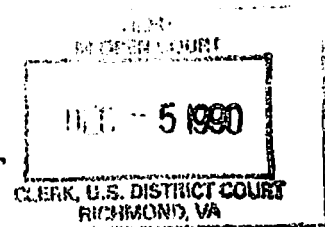


**INDICTMENT EXH (4)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA



Richmond Division

UNITED STATES OF AMERICA )

v. )

EUGENE JOHNSON )  
(Counts 1-9, 11-12, 14, 15, 17-19, 20, )  
21 & 23) )

CARLTON BROWN )  
(Counts 1, 6, 16, 17, & (22) )

REGINALD JOHNSON )  
(Count 1) )

HERBERT JOHNSON )  
(Counts 1 & 2) )

LLOYD E. ~~BROWN~~ BROWN )  
(Count 1) )

LEONIDAS BROWN aka LeLe )  
(Counts 1, 6, 10) )

BILLY HARVEY aka Lil Billy )  
(Counts 1, 6, 13) )

KEITH JEFFRIES )  
(Counts 1, 14) )

RODNEY BROWN )  
(Count 1) )

ROSALYN BROWN aka Mug )  
(Count 1) )

THERESA WRIGHT )  
(Count 1) )

APRIL BROWN )  
(Count 1) )

JOHN MCNEIL )  
(Count 1) )

CRIMINAL NO. 90-00113-R

21 USC § 846  
Conspiracy  
(Count 1)

21 USC § 841(a)(1) & 18 USC § 2  
Distribution of Cocaine  
(Counts 2-4, 7-8, 10, 12, 13, 16)

18 USC §§ 922(g)(1) & 924(a)(2) -  
Possession of Firearm by Convicted  
Felon  
(Counts 5, 17, 18)

18 USC § 1959  
Violent Crime in Aid of Racketeering  
Activity  
(Counts 6, 14, 21)

18 USC § 1952(a)(3) & 2  
Interstate Travel in Aid of Racketeering  
Enterprise  
(Counts 9, 11, 15, 19)

21 USC § 845b  
Employment of Persons Under 18 Years  
of Age  
(Count 20)

21 USC § 848  
Continuing Criminal Enterprise  
(Counts 22 & 23)

DECEMBER 1990 TERM - At Richmond

4. The murder, on or about May 4, 1988, of Ricardo Deans by Leon Smith, which murder was the result of the solicitations of EUGENE JOHNSON, CARLTON BROWN, and other members of the conspiracy, and which murder was done to further the goals of the conspiracy.

5. On or about June 28, 1988, EUGENE JOHNSON distributed cocaine to Leon Smith so that Leon Smith could redistribute the cocaine, thus generating profits for members of the conspiracy.

6. On or about September 1, 1988, the exact date being unknown to the Grand Jury, defendant EUGENE JOHNSON, and unindicted co-conspirators, traveled in interstate commerce from Richmond, Virginia, to New York City, and back, to purchase cocaine for redistribution in Richmond, Virginia.

7. On or about September 8, 1988, defendant LEONIDAS BROWN, aka LeLe, distributed a quantity of cocaine to a police informant in Richmond, Virginia.

8. On or about September 15, 1988, the exact date being unknown to the Grand Jury, defendant EUGENE JOHNSON, and unindicted co-conspirators, traveled in interstate commerce from Richmond, Virginia, to New York City, and back, to purchase cocaine for redistribution in Richmond, Virginia.

9. On or about September 16, 1988, unindicted co-conspirator Clayton Brown distributed a quantity of cocaine to a police informant in Richmond, Virginia.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES that on or about October 16, 1987, at Richmond, Virginia, in the Eastern District of Virginia, the defendant, EUGENE JOHNSON, having been convicted on or about July 19, 1984, in the Circuit Court of the City of Richmond, of a crime punishable by imprisonment for a term exceeding one year, that is, maiming and use of a firearm in the commission of a felony, did knowingly possess a firearm in and affecting commerce, to wit: fifteen (15) Intratec 9mm pistols.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and Title 18, United States Code, Section 2.)

COUNT SIX

*up to life*

THE GRAND JURY FURTHER CHARGES that on or about May 4, 1988, at Richmond, Virginia, in the Eastern District of Virginia, the defendants, EUGENE JOHNSON, CARLTON BROWN, LEONIDAS BROWN, and BILLY HARVEY, did knowingly, intentionally, and unlawfully cause the murder of Ricardo Deans, as consideration for the receipt of, or as consideration for a promise or agreement to pay, something of pecuniary value from an enterprise engaged in racketeering activity, or for the purpose of gaining entrance to or maintaining or increasing position in an enterprise engaged in racketeering activity, said racketeering activity being dealing in narcotic or other dangerous drugs.

COUNT TWENTY-TWO

20 to life

THE GRAND JURY FURTHER CHARGES that from at least January 1, 1983, and continuously thereafter up to and including the date of the filing of this indictment, in the Eastern District of Virginia and elsewhere, the defendant, CARLTON BROWN, unlawfully, intentionally, and knowingly, did engage in a Continuing Criminal Enterprise, that is, he did violate Title 21, United States Code, Sections 841 and 846, prior and subsequent to the amendments of October 12, 1984, October 27, 1986, and November 18, 1988, including, but not limited to those violations alleged in the instant indictment, which are realleged and incorporated by reference herein, and did commit other violations of said statutes, which violations were part of a continuing series of violations of said statutes undertaken by CARLTON BROWN in concert with at least five other persons with respect to whom he occupied a position of organizer, supervisor, and manager, and from which continuing series of violations, the defendant, CARLTON BROWN, obtained substantial income and resources.  
(In violation of Title 21, United States Code, Section 848.)

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES that from at least January 1, 1983, and continuously thereafter up to and including the date of the filing of this indictment, in the Eastern District of Virginia and elsewhere, the defendant, EUGENE JOHNSON, unlawfully, intentionally, and knowingly, did engage in a Continuing Criminal Enterprise, that is, he did violate Title 21, United States Code, Sections 841,